

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LAUTHA V. ANDERSON, SR.,)
)
)
Plaintiff,)
)
)
v.) Case No. 4:17-CV-02659-AGF
)
)
CHANTAY GODERT, et al.,)
)
)
Defendants.)

JOINT STIPULATION OF UNCONTESTED FACTS

The parties hereby stipulate to the following uncontested facts as required by the Court's Amended Order Relating to Trial [Doc. No. 98]:

1. At all times pertinent to his Amended Complaint, Plaintiff was incarcerated at Northeast Correction Center ("NECC") in Bowling Green, Missouri.
2. At all times pertinent to Plaintiff's Amended Complaint, Defendant Rubino was employed at NECC as a Corrections Officer II.
3. At all times pertinent to Plaintiff's Amended Complaint, Defendant Hansen was employed at NECC as a Corrections Officer III.
4. At all times pertinent to Plaintiff's Amended Complaint, Defendant Hansen was employed at NECC as a Corrections Case Manager II.
5. On November 18, 2016, Plaintiff was in the NECC administrative segregation unit and had been for about one month.
6. On November 18, 2016, Defendants Hansen and Preston, along with Acting Functional Unit Manager Robert Shane Henderson, conducted a classification hearing to

determine whether Plaintiff should remain in administrative segregation or be released to general population.

7. Defendant Hansen, Defendant Preston, and Henderson recommended that Plaintiff be released to general population and an agent of the warden approved that recommendation.

8. Defendant Rubino was working in the administrative segregation unit on November 18, 2016.

9. Plaintiff was transferred from administrative segregation to a general population housing unit on November 18, 2016.

10. The parties agree to the following brief summary of the case that may used on voir dire:

The Plaintiff in this case is Lautha Anderson, Sr. The Defendants in this case are Monica Rubino, Taylor Preston, and Jeremy Hansen. Plaintiff claims that his constitutional rights were violated by Defendants in that they failed to protect him by requiring him to move from the prison administrative segregation unit to general population even though Plaintiff informed the Defendants that his life would be at risk in general population. Plaintiff claims that on the second day after his placement in general population he was physically assaulted by another prisoner. Defendants deny that Plaintiff told them he believed that his life would be at risk if he was placed in general population.

Respectfully submitted,

ERIC S. SCHMITT
Missouri Attorney General

/s/ Michael Pritchett

Michael Pritchett, Mo Bar No. 33848
Assistant Attorney General
James W. LeCompte III, Mo Bar No. 72899
Assistant Attorney General
Missouri Attorney General's Office
P.O. Box 899
Jefferson City, Missouri 65102
Telephone: (573)751-8864 (Pritchett)
(573)821-3616 (LeCompte)
Fax: (573)751-9456
Email: Michael.Pritchett@ago.mo.gov
Email: Wil.LeCompte@ago.mo.gov

**ATTORNEYS FOR DEFENDANTS
RUBINO, PRESTON, AND HANSEN**

SCHOTTEL & ASSOCIATES, P.C.

BY: /s/James W. Schottel, Jr.
James W. Schottel, Jr. #51285MO
906 Olive St., PH
St. Louis, MO 63101
(314) 421-0350
(314) 421-4060 facsimile
jwsj@schotteljustice.com

**ATTORNEY FOR PLAINTIFF
LAUTHA V. ANDERSON, SR.**